

1 James F. Lewin (SBN 140268)  
2 Renee M. Parker (SBN 256851)  
3 THE MORTGAGE LAW FIRM, PLC  
4 27455 Tierra Alta Way, Suite B  
5 Temecula, California 92590  
Telephone: (619) 465-8200  
Facsimile: (951) 308-0055  
renee.parker@mtglawfirm.com  
TMLF File No. 137989

7 Attorneys for Objecting Creditor, U.S. Bank National Association, as Indenture Trustee on behalf of and with respect to Ajax Mortgage Loan Trust 2016-A, Mortgage-Backed Notes, Series 2016-A

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF CALIFORNIA

11 | In re: \_\_\_\_\_ | Case No. 17-06806-LA13

12 ROSALVA MENDOZA,  
aka ROSALBA MENDOZA,  
Judge: Hon. Louise DeCarl Adler

14 ||| Debtor. R.S. No: None

## STATUS REPORT

Hearing Date: March 7, 2018  
Hearing Time: 10:00 a.m.  
Courtroom: 118, Department 2  
Location: 325 West "F" Street  
San Diego, CA 92101

Subject Property Address:  
3536 - 3540 CURLEW STREET  
SAN DIEGO, CA 92103

23 U.S. BANK NATIONAL ASSOCIATION, AS INDENTURE TRUSTEE ON BEHALF OF  
24 AND WITH RESPECT TO AJAX MORTGAGE LOAN TRUST 2016-A, MORTGAGE-BACKED  
25 NOTES, SERIES 2016-A (“Creditor”), will and hereby files this Status Report as to Creditor’s  
26 Objection to Amended Plan on February 13, 2018 as Docket No. 43 (“Objection”) and as to the real  
27 property located at 3536 - 3540 CURLEW STREET, SAN DIEGO, CA 92103 (“Property”).

1           **I. FACTUAL AND PROCEDURAL SUMMARY**

2           1. Counsel for Creditor and Debtor met and conferred regarding the issues raised in  
3 Creditor's Objection, and stipulated to plan treatment in resolution of Creditor's Objection.

4           2. The Stipulation on Plan Treatment re: Real Property Located at 3536-3540 Curlew  
5 Street, San Diego, CA 92103 was filed February 26, 2018 as Docket No. 46 ("Stipulation"). More  
6 specifically, the Stipulation contained, in part, the following agreements:

7           a. To allow the Stipulation to act as a pre-confirmation modification to the Amended  
8 Plan in order to provide for Creditor's pre-petition arrears, as stated on its proof of claim, if  
9 timely filed; otherwise if a proof of claim is not timely filed, the amount stated in the  
10 Stipulation, \$12,453.23, shall be the stated arrears to be paid through the confirmed plan;

11           b. Payment of Creditor's pre-petition arrears to Creditor through the Chapter 13 Trustee;  
12 the monthly cure payment to Creditor shall be \$207.55 per month for 60 months;

13           c. Debtor shall tender the post-petition payment directly to Creditor in accordance with  
14 the terms and conditions of the Stipulation.

15           3. An order granting the stipulation, but not making any decision on potential or existing  
16 11 U.S.C. § 109(e) issues, was uploaded via the Court's Order Upload system on February 26, 2018.

17           4. The proposed order on the Stipulation will withdraw Creditor's Objection and waive  
18 Creditor's appearance at the March 7, 2018 confirmation hearing. Creditor respectfully requests that  
19 the Stipulation be granted and that its appearance at the hearing is waived.

20           DATED: February 26, 2018

21           THE MORTGAGE LAW FIRM, PLC

22           BY: /s/ Renee M. Parker

23           Renee M. Parker, Esq,

24           Attorneys for Creditor, U.S. Bank National Association,  
25 as Indenture Trustee on behalf of and with respect to  
26 Ajax Mortgage Loan Trust 2016-A, Mortgage-Backed  
27 Notes, Series 2016-A